

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-108 (1) (PAM/TNL)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	JOINT MOTION TO
)	CONTINUE DEADLINE FOR
)	FILING SENTENCING
DEREK MICHAEL CHAUVIN,)	POSITION PLEADINGS
)	
Defendant.)	
)	

COMES NOW the Defendant, by and through his counsel Eric Nelson, joined by the United States of America, by and through its undersigned attorneys, LeeAnn K. Bell, Assistant United States Attorney for the District of Minnesota, and Samantha Trepel, Special Litigation Counsel for the Civil Rights Division (together “the parties”), and respectfully move the Court for an Order continuing the time to file their Sentencing Position Pleadings until July 29, 2022.

Defendant is pending sentencing following guilty pleas to two federal civil rights violations. The parties’ sentencing positions are currently due on June 8, 2022. There is no sentencing date currently set, and thus, a continuance will not impact any previously scheduled hearing.

Defendant is aware that the state trial of two of co-defendants is in a closely related matter is set to begin jury selection on June 13, 2022, and makes this request for a continuance in order to avoid the possibility of unintentionally impacting or prejudicing jury selection or trial in that matter. The United States joins this motion because it shares Defendant’s concerns about potentially prejudicial pretrial publicity.

Dated: June 3, 2022

Respectfully submitted,

ANDREW M. LUGER
United States Attorney

KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

/s/ LeeAnn Bell

BY: LEEANN K. BELL
Assistant U.S. Attorney
Attorney ID No. 0318224

/s/ Samantha Trepel

BY: SAMANTHA TREPEL
Special Litigation Counsel
Attorney ID No. 992377 DC

/s/ Eric Nelson

Eric J. Nelson
Attorney for Derek Chauvin
Attorney No. 308808